

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

## NORTHWEST ADMINISTRATORS, INC.,

**Plaintiff,**

NATIONAL CONVENTION SERVICES,  
LLC, a New York limited liability company,

**Defendant.**

No.

**COMPLAINT TO COLLECT  
TRUST FUNDS**

1

Plaintiff, Northwest Administrators, Inc., is an organization incorporated under the laws of the State of Washington, with its principal place of business in King County, and is the authorized administrative agency for and the assignee of the Western Conference of Teamsters Pension Trust Fund (hereinafter "Trust").

1

The Western Conference of Teamsters Pension Trust Fund is an unincorporated association operating as a Trust Fund pursuant to Section 302 of the Labor Management Relations Act of 1947, as amended, to provide retirement benefits to eligible participants.

**Reid, McCarthy, Ballew & Leahy, L.L.P.**  
ATTORNEYS AT LAW  
100 WEST HARRISON STREET • NORTH TOWER, SUITE 300  
SEATTLE, WASHINGTON 98119  
TELEPHONE: (206) 285-0464 • FAX: (206) 285-8925

1 III.  
2  
3

4 This Court has jurisdiction over the subject matter of this action under Section  
5 502(e)(1) and (f) of the Employee Retirement Income Security Act of 1974 ("ERISA"),  
6 29 U.S.C. §1132(e)(1) and (f) and under §301(a) of the Taft-Hartley Act, 29 U.S.C.  
7 §185(a).  
8

9 IV.  
10

11 Venue is proper in this District under Section 502(e)(2) of ERISA, 29 U.S.C.  
12 §1132(e)(2), because the plaintiff trust fund is administered in this District.  
13

14 V.  
15

16 Defendant is a New York limited liability company.  
17

18 VI.  
19

20 Defendant is bound to a collective bargaining agreement with Local 315 of the  
21 International Brotherhood of Teamsters (hereinafter "Local"), under which the  
22 Defendant is required to promptly and fully report for and pay monthly contributions to  
23 the Trust at specific rates for each hour of compensation (including vacations,  
24 holidays, overtime and sick leave) the Defendant pays to its employees who are  
25 members of the bargaining unit represented by the Local. Such bargaining unit  
26 members are any of the Defendant's part-time or full-time employees who perform  
any work task covered by the Defendant's collective bargaining agreements with the  
Local, whether or not those employees ever actually join the Local.



1  
VII.

2  
Defendant accepted the Plaintiff's Trust Agreement and Declaration and  
3 agreed to pay liquidated damages equal to twenty percent (20%) of all delinquent  
4 and delinquently paid contributions due to the Trust, together with interest accruing  
5 upon such delinquent contributions at varying annual rates from the first day of  
6 delinquency until fully paid, as well as attorney's fees and costs the Trust incurs in  
7 connection with the Defendant's unpaid obligations.  
8

9  
VIII.

10 Since the first day of August 2017, Defendant has failed to promptly report for  
11 and pay to the Plaintiff Trust all amounts due as described above, and only  
12 Defendant's records contain the detailed information necessary to an accurate  
13 determination of the extent of the Defendant's unpaid obligations to the Trust.  
14

15 WHEREFORE, the Plaintiff prays to the Court as follows:

16 1. That Defendant be compelled to render a monthly accounting to the  
17 Plaintiff's attorneys and set forth in it the names and respective social security  
18 numbers of each of the Defendant's employees who are members of the bargaining  
19 unit represented by the Local, together with the total monthly hours for which the  
20 Defendant compensated each of them, for the employment period beginning August  
21 2017 to the date of service of this Complaint to collect Trust Funds, and for whatever  
22 amounts may thereafter accrue;

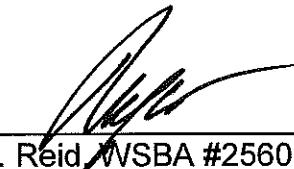
23 2. That it be granted judgment against Defendant for:

24 a. All delinquent contributions due to the Trust;

25  
26 Reid, McCarthy, Ballew & Leahy, L.L.P.  
ATTORNEYS AT LAW  
100 WEST HARRISON STREET • NORTH TOWER, SUITE 300  
SEATTLE, WASHINGTON 98119  
TELEPHONE: (206) 285-0464 • FAX: (206) 285-8925

- 1 b. All liquidated damages and pre-judgment interest due to the
- 2 Trust;
- 3 c. All attorney's fees and costs incurred by the Trust in connection
- 4 with the Defendant's unpaid obligation; and
- 5 d. Such other and further relief as the Court may deem just and
- 6 equitable.

7  
8 Respectfully submitted,

9 REID, McCARTHY, BALLEW & LEAHY,  
10 L.L.P.  


11 \_\_\_\_\_  
12 Russell J. Reid, WSBA #2560  
13 Attorney for Plaintiff  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

Reid, McCarthy, Ballew & Leahy, L.L.P.  
ATTORNEYS AT LAW  
100 WEST HARRISON STREET • NORTH TOWER, SUITE 300  
SEATTLE, WASHINGTON 98119  
TELEPHONE: (206) 285-0464 • FAX: (206) 285-8925